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April 21, 2023

**VIA HAND DELIVERY & ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket No. 22-42-NG – Issuance of Advisory Opinion to EFSB re RIE Application to Construct an LNG Vaporization Facility on Old Mill Lane, Portsmouth, RI Responses to PUC Data Requests – Set 3 (Full Set)**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company (the “Company”), I have enclosed the Company’s responses to the Public Utilities Commission’s (“PUC”) Third Set of Data Requests (Full Set) in the above-referenced docket.

Attachment PUC 3-3 to the Company’s response to Public Utilities Commission Data Request 3-3 contains confidential information; and therefore, the Company has provided redacted public versions of the attachment and unredacted versions subject to a motion for protective treatment.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3351.

Sincerely,



George W. Watson III

Enclosures

cc: Docket 22-42-NG Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Heidi J. Seddon

April 21, 2023

Date

**Docket No. 22-42-NG – Needs Advisory Opinion to EFSB regarding Narragansett Electric LNG Vaporization Facility at Old Mill, Portsmouth, RI  
Service List update 4/6/2023**

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**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

IN RE: THE ISSUANCE OF ADVISORY OPINION )  
TO THE ENERGY FACILITY SITING BOARD )  
REGARDING THE NARRAGANSETT ELECTRIC )  
COMPANY APPLICATION TO CONSTRUCT ) DOCKET NO. 22-42-NG  
AN LNG VAPORIZATION FACILITY ON )  
OLD MILL LANE, PORTSMOUTH, RHODE ISLAND )

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY  
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

The Narragansett Electric Company (the “Company”) hereby respectfully requests that the Public Utilities Commission (“Commission” or “PUC”) grant protection from public disclosure of certain confidential information submitted by the Company as Attachment PUC 3-3 to the Company’s Response to the Commission’s Third Set of Data Requests. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the Commission preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

The Company is seeking protective treatment of certain Attachment PUC 3-3 because it contains critical energy infrastructure information (“CEII”) that should not be treated as a public record under state law as the information is highly sensitive scientific and technological data about the existing distribution infrastructure, “the disclosure of which would endanger the public welfare and security.” R.I.G.L. §38-2-2(4)(F). This motion seeks protection for the unredacted confidential version of the Attachment PUC 3-3 to the Company’s Responses to the Commissions Third Set of Data Requests (the “CEII Material”).

CEII is defined by the Federal Energy Regulatory Commission (FERC) as:

Specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure (physical or virtual) that:

1. Relates details about the production, generation, transmission, or distribution of energy;
2. Could be useful to a person planning an attack on critical infrastructure;
3. Is exempt from mandatory disclosure under the [Federal] Freedom of Information Act, 5 U.S.C. § 552; and
4. Does not simply give the general location of the critical information.

18 CFR § 388.113(c)(2). In turn, “critical energy infrastructure” is defined as:

[E]xisting and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters.

18 CFR § 388.113(c)(4).

Accordingly, The Company requests that a protective order be issued by the EFSB to protect from public disclosure the CEII Material and that any such information which is used in these proceedings be made a part of the sealed record.

## **II. LEGAL STANDARD**

Rhode Island’s Access to Public Records Act (APRA), R.I.G.L. §38-2-1 *et. seq.*, sets forth the parameters for public access to documents in the possession of state and local government agencies. Under APRA, all documents and materials submitted in connection with the transaction of official business by an agency are deemed to be a “public record,” unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I.G.L. §38-2-2(4). Therefore, to the extent that information provided to the Board falls within one of the designated exceptions to APRA, the Board has the authority under the terms of APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I.G.L. §38-2-2(4)(F) provides that the following records shall not be deemed public:

Scientific and technological secrets and the security plans of military and law enforcement agencies, the disclosure of which would endanger the public welfare and security.

### **III. BASIS FOR CONFIDENTIALITY**

The Company seeks protection from public disclosure of CEII material not for its own internal purposes, but for the welfare and safety of the public. The general practice of the Company and its affiliates is to provide CEII material to select external audiences on a need-to-know basis after execution of a Non-Disclosure Agreement. Because of national security concerns as evidenced by FERC's CEII regulations, quoted above, the Company seeks a Protective Order for the CEII Material in this proceeding.

The benefits of protecting this information from the public outweighs the public interest inherent in disclosure of information pending before regulatory agencies. The equipment demarcation information in the CEII Material is critical to the safe and reliable operation of the natural gas distribution system and the safety of the public in general. The information should be treated in a confidential manner because disclosure of this information to the public could facilitate the ability of individuals to damage the Company's utility infrastructure and the regional gas distribution system. Further, the CEII Materials are the technical details of the system which should be of no interest to the public.

Public disclosure of this information would be contrary to the public interest and represent an undue risk to public safety. Extreme care must be exercised to protect sensitive information regarding the location of critical infrastructure from unnecessary public disclosure. For these reasons, the Board should determine that the CEII materials are "scientific and technological secrets ... the disclosure of which would endanger the public welfare and security" and provide

protective treatment for the CEII Material by granting this Motion for a Protective Order pursuant to R.I.G.L. §38-2-2(4).<sup>1</sup>

#### **IV. CONCLUSION**

The Company respectfully requests that the CEII Material identified herein (i) be kept confidential indefinitely, (ii) not be placed in the public docket, and (iii) be disclosed only to the Board and to other parties that sign non-disclosure agreements.

[SIGNATURES ON NEXT PAGE]

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<sup>1</sup> 18 CFR §§388.112 and .113 of the FERC regulations provide for protection of CEII material submitted to FERC. As such, CEII material is also exempt from public disclosure under §38-2-2(4)(S) which exempts from disclosure records “required to be kept confidential by federal law or regulation...”

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC  
COMPANY**

By its attorneys,



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Dated: April 21, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2023, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 22-42-NG.



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Heidi J. Seddon

The Narragansett Electric Company  
RIPUC Docket No. 22-42-NG  
In Re: The Issuance of Advisory Opinion to the  
Energy Facility Siting Board Regarding  
The Narragansett Electric Company  
Application to Construct and LNG Vaporization Facility on  
Old Mill Lane, Portsmouth, Rhode Island  
Responses to the Commission's Third Set of Data Requests  
Issued on April 5, 2023

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PUC 3-1

Request:

Referencing the Gas Long Range Resource and Requirements Plan for the Forecast Period 2022-2023 to 2026-2027, please explain if the 1,045 Dth per hour is a physical or contractual limit. For any response that is not definitively one or the other, please fully explain.

Response:

The referenced 1,045 Dth per hour is both a contractual limit and a physical limit. The Company currently holds contracts that allow up to a maximum hourly delivery rate of 1,045 Dth per hour. Following the 2019 incident, the Company requested incremental volumes to Portsmouth Gate Station to offset the capacity constraint, however the Company was informed by Enbridge that the lateral feeding the station was fully subscribed and no incremental volumes were available.

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PUC 3-2

Request:

Referencing the Company's response to DIV 2-1 and the Division's explanation of recent events of February 3-4, 2023, on pages 11-13 of their direct testimony, did the Company consider any alternatives to vaporization? If not, why not?

Response:

The Company took several steps to minimize vaporization on Aquidneck Island during the cold weather event on gas day February 3, 2023. First, interruptible customers were curtailed, followed by initiating a Demand Response event. The Company then considered alternate means of load reduction, the Voluntary Load Reduction Plan and the Strategic Supply Interruption Plan, however those plans or any other means would result in curtailing service to firm customers (impacting service to commercial and residential customers). Instead of initiating those plans, the Company opted to maintain service to all customers using all available resources, including the use of the vaporization equipment at Old Mill Lane.

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PUC 3-3

Request:

What would have happened on February 3-4, 2023, if the LNG vaporization facilities had not been in place? Please explain all steps the Company would have taken to address the event in the absence of the facilities.

Response:

The Company would have reviewed the potential for hourly capacity shortfall up to the design day/peak hour of approximately 145 Dth. Using the Voluntary Load Reduction Plan, the Company would then identify potential large, non-heating usage customers located on Aquidneck Island that may be willing to be curtailed to preserve capacity for heating customers. The Company is aware of approximately 11 customers on Aquidneck Island that could be curtailed to reduce demand from the Portsmouth Take station. The largest is an account at Naval Station Newport, which is interruptible and was already curtailed. The second largest is another Navy account which participates in the Demand Response program, however the Navy reported issues with its alternate fuel operation and opted out of the program during the February 3, 2023 cold weather event.

The remaining large usage customers are schools, hospitals, a hotel, and Oxbow Farms, and all of the locations use gas for heating in addition to other non-heating related uses. If the Company were successful in shutting off all these customers, it would have needed to be done in the days leading up to the cold weather event, likely on January 31 or February 1, and it would account for approximately 111 Dth/hr reduction to peak hour usage. After that, the Company would need to identify a zone to be shut off to account for the remaining 34 Dth/hr necessary reduction (145 Dth/hr shortfall minus the 111 Dth/hr large customer reduction). The Company would then review the sectionalizing zone plan and identify an area that would allow for the approximate reduction. There are three identified zones in Newport that could be utilized, one totals approximately 287 Dth/hr and the other two each account for approximately 67 Dth/hr. The Company would propose isolating Zone 3, which would reduce peak hour demand on Aquidneck Island by an estimated 67.1 Dth/hr, and contains approximately 1,300 customers, both residential and commercial. Isolating this area involves the use of existing system valves and would need to be done prior to the cold weather event, similar to isolating the targeted large usage customers, potentially on February 1 or February 2. The Company would also assign resources on the day of the event to isolate Zone 2, which would provide for reduction in demand by approximately 68 Dth/hr and contains approximately 1,100 residential and commercial customers in case of

PUC 3-3, Page 2

unforeseen demand on the system to keep total send out at or below 1045 Dth/hr. See Attachment PUC 3-3 for a description of the sectionalizing zones and associated map of the zones that could be considered for an involuntary load shed to sufficiently reduce gas demand to prevent an outage.

It should be noted that any type of involuntary load shed implementation is quite complex and very involved. It is typically only used as an absolute last resort

For an involuntary curtailment impacting 1,300 customers discussed here, the Company would follow the Gas Emergency Response Plan (ERP) and stand up our Incident Command Structure (ICS). Under our ERP, the event would be categorized as a Type 1 (greater than 1000 customers or an event lasting more than 72 Hours) . At a high level, this response effort would include:

- Staffing (RIE Emergency Response Leadership Command Staff as well as internal General Support Staff i.e. Operations, Planning Logistics, Customer service etc., and Mutual Aid if needed)
- Designate Emergency Operating Center and/or Staging Site as needed
- Implement ICS full protocol
- Regulatory Reporting throughout event
- Activate Communications Process
- Activate the Emergency Response Organization (ERO) with Executive Level Incident Commander appointed

Restoration to the 1,300 involuntarily curtailed customers would include a three-step process to 1) shut off gas service to each of the customer properties, 2) perform an isolation of the area, re-introduce gas to the sections incrementally, and perform leak surveys, and 3) begin service restoration by re-visiting each customer home or premise to perform inspections and then re-light customer equipment.

This significant effort would be a 24/7 operation lasting at least 3 days or more, supported by many hundreds of field-based crews and office support staff including internal company employees, external contractors, mutual assistance from adjacent utilities, locksmiths, and local law enforcement officers to aid the accessibility to unoccupied buildings and homes in performing the needed safety and restoration activities.

The safety of these disrupted residents and communities is always the primary objective of any outage restoration response. The Company would coordinate with various state agencies to

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PUC 3-3, Page 3

ensure this intention. For example, the RI Emergency Management Agency (RIEMA) would be heavily involved to ensure a safe and efficient restoration for the many businesses and communities affected. Critical support services like temporary warming shelters would be required for an event during this time of the year considering the cold temperatures and multi-day duration.

Following the event and restoration of service to affected customers, the Company would execute the Emergency Response Plan to demobilize this large workforce safely and efficiently.

The Company estimates the cost to undertake the involuntary curtailment of Zone 3 customers and the cost of the restoration and attendant emergency response would range between \$4.5 - 5 million dollars. This estimate is based upon the cost per customer outage that was realized from the Aquidneck Island gas service interruption event on January 21, 2019.

**Newport Sectionalizing Summary**

Isolation Area Summary Report							Summary:
Iso Area	65F Demand		-3F Demand		Customers	Valves to Isolate	
Zone	mscfh	dth/hr	mscfh	dth/hr	count	count	
1	-22.202	-22.8	-278.781	-286.9	4024	14	0 new valves
2	-4.651	-4.8	-65.903	-67.8	1112	13	16 existing valves
3	-2.534	-2.6	-65.159	-67.1	1338	6	0 existing critical valves
							16 unique valves

Zone 1	Zone 2	Zone 3
Reg Stations	Reg Stations	Reg Stations
RIS-N219	RIS-N211	RIS-N216
[Redacted]	[Redacted]	[Redacted]
RIS-N213L		RIS-N212
[Redacted]		[Redacted]
Valves	Valves	Valves
[Redacted]	[Redacted]	[Redacted]

# Newport LP - Pressure View with Zones



**Legend**

**LP Sectionalizing Valves**

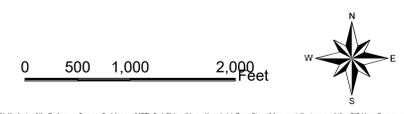
- Normally Open, Non-Critical Stations
- Regulator Station

**Distribution Main**

- <=2 - Low
- >2 and <=30 - Intermediate
- >30 and <=60 - High
- >60 and <=99 - High
- Other

**Landbase**

- Ocean



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, Mapbox, and the GIS User Community

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PUC 3-4

Request:

Please provide the number of gas customers, by rate class, on Aquidneck Island who could be served by these facilities.

Response:

Please see the table below for the number of Aquidneck Island natural gas customers, by rate class, as of January 2023.

	Rate Code	Newport 02840	Newport / Middletown 02841	Middletown 02842	Portsmouth 02871	Grand Total
Resi Non-Heating	10	514		62	46	622
LI Resi Non-Heating	11	9		2	2	13
Resi Heating	12	6797		2799	1940	11536
LI Resi Heating	13	266		57	34	357
Small C&I	21	691	6	438	243	1378
Med C&I	22	182	5	134	39	360
Large High Load C&I	23	12	3	1	1	17
XLarge High Load C&I	24	1				1
Large Low Load	33	7	1	5	7	20
Gas Lamps	80	21			2	23
Small C&I (FT2)	14EN	1				1
Med C&I (FT1)	22EN	14		4	3	21
Large High Load C&I (FT1)	23EN	4		1		5
XLarge High Load C&I (FT1)	24EN	1				1
Large Low Load C&I (FT1)	33EN	1		1		2
XLarge Low Load C&I (FT1)	34EN	2		2		4
Large Low Load C&I Default Transportation	58ENLL		1	1		2
XLarge High Load C&I Default Transportation	58ENXLH		1			1
<b>Grand Total</b>		8523	17	3507	2317	14364

<b>Residential Total</b>	<b>12,528</b>
<b>C&amp;I Total</b>	<b>1,836</b>

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PUC 3-5

Request:

Referencing the Company’s response to Middletown 3-1, please provide, by rate class, an assumed breakdown of the 63% electrified and 37% remaining gas customers.

Response:

The No Infrastructure solution defined in the September 2020 Aquidneck Island Long-Term Gas Capacity Study – which is noted to “Electrify ~63% of forecasted gas customers by 2034/35” in Table 18 of that study – assumed the same level of electrification for all customer classes, so approximately 63% of both forecasted residential heating and commercial customers are assumed to electrify by 2034/35 in that solution. Table 1, below, lists total forecasted residential heating and commercial gas customers on Aquidneck Island in 2034-35 according to the June 2020 Adjusted Baseline Forecast, which was used in that study, and the total number of those forecasted customers assumed to electrify as part of that solution.

**Table 1. Assumed Incremental Electrifications versus Adjusted Baseline Forecast in 2034-35 under the No Infrastructure Solution as Defined in the September 2020 Aquidneck Island Long-Term Gas Capacity Study**

<b>Customer Segment</b>	<b>Total Baseline Forecasted Aquidneck Island Gas Customers in 2034-35, per June 2020 Adjusted Baseline Forecast</b>	<b>Cumulative Electrifications of Forecasted Customers under No Infrastructure Solution by 2034-35</b>	<b>Cumulative Electrified Customers as Percent of Baseline Forecasted Gas Customers</b>
<b>Residential Heating</b>	13,529	8,541	63%
<b>Commercial</b>	1,829	1,134	62%
<b>Total</b>	15,359	9,675	63%